



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EDP:BET
F. #2024R00934

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 7, 2025

By E-mail and ECF

Michael K. Schneider, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

Re: United States v. Svetlana Dali
Criminal Docket No. 25-14 (AMD)

Dear Mr. Schneider:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The material will be available to you via USAfx. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

A. Statements of the Defendant

- Reports from U.S. Customs and Border Protection ("CBP") and Port Authority of New York and New Jersey ("Port Authority") containing the defendant's statements, bearing Bates numbers SD000092- SD000096.

B. The Defendant's Criminal History

- Defendant's criminal history reports, bearing Bates numbers SD000097- SD000135.¹

¹ These reports supplement the criminal history reports that we produced in our first production dated March 6, 2025.

C. Documents and Tangible Objects

- Delta Air Lines, Inc. records, bearing Bates numbers SD000136-SD001338.
- Still images of video surveillance and layout map of Terminal 4 from John F. Kennedy International Airport Terminal LLC (“JFKIAT”), bearing Bates numbers SD001339-SD001346.
- Surveillance videos and still images received from Port Authority, bearing Bates numbers SD001347-SD001371.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ Brooke Theodora
Brooke Theodora
Assistant U.S. Attorney
(718) 254-6342

Enclosures

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)